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WESTERN DISTRICT OF LOUISIANA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA, MONROE DIVISION**

STATE OF MISSOURI; STATE OF  
LOUISIANA; AARON KHERIATY; MARTIN  
KULLDORFF; JIM HOFT; JAYANTA  
BHATTACHARYA; JILL HINES,

*Plaintiffs*

v.

Civil Action No. 3:22-cv-1213

JOSEPH R. BIDEN, JR.; VIVEK H.  
MURTHY; XAVIER BECERRA;  
DEPARTMENT OF HEALTH & HUMAN  
SERVICES; ANTHONY FAUCI et al.,

*Defendants*

**Motion to Seal Supplement to Motion for Leave to Proceed Under Pseudonym**

Movant, proceeding under pseudonym, respectfully moves this Honorable Court to file under seal the Supplement to Motion for Leave to Proceed Under Pseudonym, submitted herewith.

Grounds for Sealing:

**Protection of Privacy:** The supplement contains sensitive information, specifically the true identity of the Movant, which must be protected from unnecessary disclosure.

**Necessity of Anonymity:** As articulated in the main motion, there are distinct and substantial risks associated with revealing Movant's true identity, including potential harm and retaliation.

**No Prejudice to Other Parties:** Sealing this document will not prejudice the defendants or any other party to the litigation, as it pertains solely to the procedural request to proceed pseudonymously.

**Interest of Justice:** Sealing this document is in line with the interests of justice, maintaining the focus on the merits of the case while respecting the Movant's valid privacy concerns.

WHEREFORE, Movant respectfully moves this Court to file under seal the Supplement to Motion for Leave to Proceed Under Pseudonym and requests such other relief as the Court deems just and appropriate.

Respectfully submitted this 15<sup>th</sup> day of August, 2023.

Brandon Q. Doe, Movant